

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY AND KENTUCKY UTILITIES)	
COMPANY FOR REVIEW, MODIFICATION, AND)	CASE NO.
CONTINUATION OF EXISTING, AND ADDITION OF)	2011-00134
NEW, DEMAND-SIDE MANAGEMENT AND)	
ENERGY-EFFICIENCY PROGRAMS)	

COMMISSION STAFF'S FIRST INFORMATION REQUEST TO
ASSOCIATION OF COMMUNITY MINISTERIES

The Association of Community Ministries, Inc. ("ACM"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before August 19, 2011. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The ACM shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which ACM fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Provide a brief explanation of ACM's understanding of the purpose of Demand Side Management ("DSM") programs. Include in the explanation whether ACM believes DSM programs should pay for themselves.

2. Provide a brief explanation of ACM's understanding of the purpose of Energy Efficiency ("EE") programs. Include in the explanation whether ACM believes that DSM and EE programs are the same.

3. On page 1 of the Testimony of Marlon Cummings on Behalf of Association of Community Ministries, Inc. ("ACM Testimony"), filed July 25, 2011, the ACM Testimony states, "ACM agencies obtain funding from donations and local government grants."

a. Describe the type of local government grants from which ACM agencies receive funding.

b. Are the ACM agencies the 15 independent community ministries? If not, identify those individuals or groups that comprise ACM.

c. Does ACM receive any funding from Louisville Gas & Electric Company (“LG&E”)? If yes, provide the amounts received during the past three years and explain how the funds were spent.

4. Refer to Pages 4 and 5 of the ACM Testimony. There are listed percentages as to the 10 highest poverty zip codes in Jefferson County, the percentage of the residential DSM/EE charges billed that were paid by those LG&E customers, and the percentage of participation of those LG&E customers in the various programs. The following table is a listing of those percentage descriptions and percentages.

LG&E Residential Customers Who Live in the Ten Highest Poverty Zip Codes in Jefferson County	18.2%
Percentage paid of the Residential DSM/EE Charges Billed by LG&E from April 2009 through December 2010	26.8%
Residential Conservation Online Audits	11.5%
Residential Conservation Receiving CFL Bulbs	11.3%
Residential Conservation Participation in Onsite Audit	15.4%
Residential HVAC Diagnostic and Tune Up Program - Diagnostic Test Performed	16.5%
Residential HVAC Tune Up Program – Received Tune-up	15.6%
Residential Load Management Program - Programmable Thermostats Installed	17.3%
Residential Load Management Program - Received Load Control Switches	3.65%
Residential High Energy Lighting Program - Receiving CFL Bulbs	22.1%

a. Explain whether ACM, through its ministries and agencies, counsels low-income LG&E customers as to the availability of the various residential DSM/EE programs for which they might qualify.

b. Explain whether ACM assists low-income LG&E customers in identifying energy conservation methods that might help reduce their energy bills.

c. Explain whether ACM, through its ministries and agencies, has computers available for use by low-income LG&E customers so that they can go online and participate in the online audit in the Residential Conservation program. Explain.

d. Does ACM, through its ministries and agencies, encourage low-income LG&E customers to request the Compact Fluorescent Light (“CFL”) bulbs that are available to be mailed free to their home? Explain.

e. Explain whether ACM knows the average number of household members per residential account in the 10 highest poverty zip codes in Jefferson County and, if so, what is that number versus the average number of household members per residential account in the remaining Jefferson County zip codes? Explain.

f. Even though the percentage of customers receiving load switches under the Residential Load Management Program is low, would many of the low-income LG&E customers who live in the 10 highest poverty zip codes in Jefferson County still qualify for a programmable thermostat? Explain.

g. Has ACM encouraged the LG&E customers in the 10 highest poverty zip codes in Jefferson County, if they qualify, to participate in the Kentucky Home Performance Program? Explain.

h. If LG&E's efforts to communicate and educate LG&E customers about the available residential DSM/EE programs do not increase participation, what suggestions does ACM have to increase participation?

5. Explain whether ACM, through its ministries and agencies, refers those LG&E customers in the 10 highest poverty zip codes that may qualify for the WeCare Program to local community action agencies, or community-based organizations.

6. Refer to page 8 of the ACM Testimony. There is a discussion as to struggling LG&E customers whose energy usage is paid through their rent. If the LG&E customer's landlord implements energy saving measures that reduce energy usage and the landlord does not lower the LG&E customer's rent payment, what measures could be taken.

7. Explain how ACM participates in LG&E's Energy Efficiency Advisory Group, or its participation, if any, as an invitee to meetings to discuss DSM/EE programs.


Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: **AUG 08 2011**

cc: Parties of Record

Honorable David Jeffrey Barberie
Corporate Counsel
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KENTUCKY 40507

Honorable Kendrick R Riggs
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KENTUCKY 40202-2828

Lonnie Bellar
Vice President, State Regulation & Rates
LG&E and KU Services Company
220 West Main Street
Louisville, KENTUCKY 40202

Honorable Iris G Skidmore
415 W. Main Street
Suite 2
Frankfort, KENTUCKY 40601

David Brown
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KENTUCKY 40202

Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Services Company
220 West Main Street
Louisville, KENTUCKY 40202

Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KENTUCKY 40601-8204

Hon. Tom Fitzgerald
Kentucky Resources Council, Inc.
PO Box 1070
Frankfort, KENTUCKY 40602

Rick E Lovekamp
Manager - Regulatory Affairs
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

Eileen Ordovery
Legal Aid Society
416 West Muhammad Ali Boulevard
Suite 300
Louisville, KENTUCKY 40202